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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

JAN 16 1998

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )

Calling Party Pays Service )

Option in the Commercial )

Mobile Radio Services )

WT Docket No. 97-207

Reply Comments of Illuminet, Inc.

Illuminet, Inc. ("Illuminet")<sup>1</sup> hereby files these reply comments in response to the October 23, 1997 Notice of Inquiry issued by the Federal Communications Commission ("FCC") in the above-captioned matter.<sup>2</sup> Illuminet has reviewed several of the comments filed in this proceeding. Based on this review, there appears to be general agreement on two (2) areas associated with the provision of Calling Party Pays ("CPP") services: (1) CPP services should be provided on an optional, rather than mandatory, basis; and (2) the provision of CPP should be consistent with the development of national technical standards as established by appropriate standard setting forums. Assuming that the provision of CPP services is found to be in the public interest, Illuminet concurs with these positions.

Carriers should be able to elect to offer CPP services based on market considerations. Likewise, industry forums provide an

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<sup>1</sup> Illuminet's December 16, 1997 comments focused on the technical aspects of the provision of Calling Party Pays ("CPP") services, in general, and the billing and collection aspects of CPP, in particular. See generally Comments of Illuminet, Inc., WT Docket No. 97-207, filed December 16, 1997 ("Illuminet Comments"). These reply comments take a similar focus.

<sup>2</sup> In the Matter of Calling Party Pays Service Option in the Commercial Mobile Radio Services: Notice of Inquiry, WT Docket No. 97-207, FCC 97-341 (rel. Oct. 23, 1997).

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appropriate vehicle to ensure that the technical requirements of a new service are analyzed from the various perspectives of interested parties.

As demonstrated in its comments, however, Illuminet is concerned that carriers electing not to participate in the optional provision of CPP may be required to change existing network protocols in order to accommodate those carriers that elect to offer CPP services.<sup>3</sup> This result is contrary to the concept of providing CPP on an "optional" basis (since costs would be incurred by all carriers regardless of the choice to offer these services), and is unnecessary.

Illuminet demonstrated that relying on the current, yet slightly enhanced, Transaction Capabilities Application Part or "TCAP" protocols would eliminate the potential that carriers not electing to offer CPP services would incur costs.<sup>4</sup> Moreover, relying upon the enhanced TCAP message protocol, an expanded Line Information Database/Wireless Information Database, and national clearinghouse functions also will minimize the risk of "leakage," i.e., uncollectible and unbillable CPP calls,<sup>5</sup> and ensure that the

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<sup>3</sup> For example, network changes would be required of all carriers (both those electing to participate in CPP services and those electing not to offer such services) in the event that the provision of CPP services required changes to the ISDN User Part ("ISUP") protocols. See Illuminet Comments at 2 (discussion of technical and operational issues arising from changes made to ISUP protocols).

<sup>4</sup> See id. at 3.

<sup>5</sup> Illuminet Comments at 6-7.


necessary information required for billing and collecting CPP calls is supplied in existing and accepted industry standard formats. For example, by ensuring that all necessary data required for billing and collecting CPP calls remains part of the TCAP message through all routing points associated with the CPP call, the terminating carrier can identify, among other items, the appropriate billing party.

Assuming the provision of CPP service is found to be in the public interest, Illuminet submits that relying upon the TCAP message protocol will best accommodate the technical provision of CPP service on an optional basis, while ensuring that technical solutions to the uncollectible, unbillable and call branding issues can be resolved in an efficient manner. Accordingly, Illuminet requests that the Commission provide guidance to the industry efforts to resolve CPP technical issues in a manner consistent with the positions taken by Illuminet in this proceeding.

Respectfully submitted,

Illuminet, Inc.


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January 16, 1998

## **CERTIFICATE OF SERVICE**

I, Shelley Bryce, hereby certify that a copy of the foregoing "Reply Comments of Illuminet, Inc.", was served on this 16th day of January 1998, by first class, U.S. mail, postage prepaid, to the following parties:

  
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